

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Nicholas J. Cremona

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ROBERT ROMAN,

Defendant.

Adv. Pro. No. 10-04292 (SMB)

**CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: December 21, 2015.
2. Fact Discovery shall be completed by: September 22, 2016.
3. The Disclosure of Case-in-Chief Experts shall be due: December 12, 2016.
4. The Disclosure of Rebuttal Experts shall be due: February 10, 2017.
5. The Deadline for Completion of Expert Discovery shall be: March 13, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: March 20, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before April 3, 2017.
8. The Deadline for Conclusion of Mediation shall be: On or before August 1, 2017.

Dated: New York, New York  
September 29, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona  
David J. Sheehan  
Nicholas J. Cremona  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

Brett Wall (*admitted pro hac vice*)  
Jason Perdion (*admitted pro hac vice*)  
David Proaño (*admitted pro hac vice*)  
Gretchen Lange (*admitted pro hac vice*)  
Darren Crook (*admitted pro hac vice*)  
1900 East 9th Street, Suite 3200  
Cleveland, OH 44114  
Telephone: (216) 861-7834  
Facsimile: (216) 696-0740

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and for the Estate of Bernard  
L. Madoff*